
From: Wallace Elton [eb@vermontel.net]
Sent: Monday, August 16, 2004 9:22 PM
To: ADMIN-S&E
Subject: Don't undermine NEPA protections

August 16, 2004

Department of Homeland Security
Environmental Planning, Office of Safety and Environment Washington, D.C. 20528

Dear Secretary Ridge and Homeland Security staff,

I am writing to comment on the the Department of Homeland Security's current proposal for implementing the National Environmental Policy Act (NEPA). I oppose this proposal because it would permit an excessive number of exclusions from NEPA and could throw a cloak of unneeded secrecy over government activities that have previously operated and should continue to operate in public view.

In my view, abandoning public review of government activities that could harm the environment that supports us and our natural heritage would mean foregoing a basic right and thus in itself represent a surrender to terrorists.

As you know, one of NEPA's purposes is to allow just such public review. The department's proposal would impede that purpose with its overly broad use of categorical exclusions. Categorical exclusions make sense for routine activities that pose no significant risk of environmental harm. This proposal goes well beyond such reasonable use of exclusions by including types of activities that could cause significant damage. Construction of fences and barriers by the Border Patrol, for instance, could impede wildlife migration and degrade wilderness values, while ground patrols in border areas could destroy or damage critical habitat for endangered species.

Other proposed categorical exclusions, such as logging and disposal of waste and hazardous material, should be completely abandoned because they do not advance security in a meaningful way while they run roughshod over environmental protection. Others should be narrowed in scope.

Just to be clear: I support the mission of the Department of Homeland Security. But I do not support using security as an excuse to needlessly harm our air, water, land, and wildlife. The breadth of the undefined categories of information that would be withheld from public view is a vast expansion over the current policy that allows only classified information to be withheld from NEPA documents. In my view, this change cannot be justified by claims of protecting national security. The proposal should be more specific so as to minimize withheld information and maximize transparency.

In summary, the proposal goes well beyond what is necessary to protect national security and would jeopardize the very democratic ideals that the Department of Homeland Security was created to protect. I urge you to severely limit the use of categorical exclusions and the withholding of important information from the public.

Thank you for the opportunity to comment.

Sincerely,

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